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HARRISBURG PA

MAY 30 2003

MARY E. D'ANDREA, CLERK

Per CF

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN  
MARRONE, wife, both individually and  
in their capacity as parents and guardians  
for VIDA MARRONE, a minor, and  
MATTHEW ADAM MARRONE,

Plaintiffs,

vs.

ALLSTATE INSURANCE COMPANY,  
LINDA M. EDLEMAN, FRED SCHAFER,  
MT. GRETNAL REALTY, and HOUSE  
MASTERS,

Defendants.

Civil Act. No.: 1:CV-01-0773

(U.S. Dist. Judge Yvette Kane)

**JURY TRIAL DEMANDED**

Exhibit 14: Supplemental Affidavit of Tom Moore.

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JACK MARRONE, husband, KAREN  
MARRONE, wife, both individually and  
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for VIDA MARRONE, a minor, and  
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LINDA M. EDLEMAN, FRED SCHAFER,  
MT. GRETNAL REALTY, and HOUSE  
MASTERS,

Civil Action No.: 1:CV-01-0773

(U.S. District Judge Yvette Kane)

**JURY TRIAL DEMANDED**

STATE OF PENNSYLVANIA )

COUNTY OF ALLEGHENY )ss

**SUPPLEMENTAL AFFIDAVIT OF TOM MOORE**

BEFORE ME, the undersigned authority, a Notary Public in and for the  
County and State aforesaid, personally appeared Tom Moore, known to me (or  
satisfactorily proven) to be the person whose name is subscribed, and having been  
duly sworn, deposes and states under oath as follows:

1. I am above the age of 18, of sound mind and capable of executing this  
Supplemental Affidavit.



2. My curriculum vitae establishing my competency as an expert is attached as exhibit 1 of my Affidavit of November 6, 2002.

3. The facts and opinions contained in my reports and supporting documentation attached to my reports are based on my personal knowledge, experience and all of those opinion are based upon a reasonable degree of professional home inspection certainty, and are attached as exhibit 2 of my Affidavit of November 6, 2002.

4. Attachment 4 to the my report, photographs of the lower level of the Marrone home immediately after the mold infestation, is attached to my Affidavit of November 6, 2002 as exhibit 3.

5. Attachment 7 to my report, photographs of the Marrone home as it was at the time of the inspection I conducted on August 12, 2002, is attached to my Affidavit of November 6, 2002 as exhibit 4.

6. I relied upon the opinions of Robert Pfromm, CIH of Advanced Applied Sciences as I stated within the reference page of my report, which are the types of opinions I ordinarily rely upon in conducting my business.

7. Based upon a reasonable degree of professional Home Inspection certainty it is my opinion that Housemaster, through its principal Charles E. Bertoud, Jr., was professionally negligent and failed to meet the standard of care



required in the industry.

8. All these problems as noted in my report would have been present to some degree when the house was inspected by Housemaster, and certainly taking them all together or the majority of them, there is no question that Housemaster should have told the Marrones not to purchase this property unless any potential for mold problems or mold problem was remedied and removed.

The failure of Housemaster to so inform the Marrones of this problem was a deviation from the standard of care required by professional home inspectors, and was negligence on their part. All my opinions stated in my report and this Supplemental Affidavit are based upon a reasonable degree of professional home inspection certainty.

5-29-03  
DATE

Tom Moore  
Tom Moore

SWORN TO and SUBSCRIBED TO

before me this 29th day

of May, 2003.

[Signature]  
(Notary)

